

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Docket Ref. No. 737**

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**NOTICE OF SALE OF MISCELLANEOUS ASSETS FREE AND CLEAR OF  
LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES  
PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE**

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**PLEASE TAKE NOTICE** that, on June 27, 2023, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE** that, on November 27, 2023, the Court entered the order attached hereto (without exhibits) as **Schedule 2** [Docket No. 737] (the “**Order**”)<sup>2</sup> that, among other things, authorized and established certain procedures (the “**Sale Procedures**”) for the sale of Assets free and clear of all liens, claims, interests, and encumbrances.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the Sale Procedures, parties seeking to object to any proposed Asset sale listed on **Schedule 1** attached hereto must file

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Order or the Motion, as applicable.

an objection (each, an “**Objection**”) with the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or prior to **December 20, 2023** (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** serve a written objection on (a) the U.S. Trustee, 844 King Street, Suite 2007, Wilmington, Delaware 19801, Attn: Benjamin A. Hackman ([Benjamin.A.Hackman@usdoj.gov](mailto:Benjamin.A.Hackman@usdoj.gov)); (b) counsel to the Debtors, (i) White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: Thomas E Lauria ([tlauria@whitecase.com](mailto:tlauria@whitecase.com)); 1221 Avenue of the Americas, New York, NY 10020, Attn: David M. Turetsky ([david.turetsky@whitecase.com](mailto:david.turetsky@whitecase.com)); (ii) Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200, Wilmington, Delaware 19801, Attn: Donald J. Detweiler ([Don.Detweiler@wbd-us.com](mailto:Don.Detweiler@wbd-us.com)) and Morgan Patterson ([Morgan.Patterson@wbd-us.com](mailto:Morgan.Patterson@wbd-us.com)); (c) counsel to the Creditors’ Committee, Troutman Pepper Hamilton Sanders LLP, 875 Third Avenue New York, NY 10022, Attn: Deborah Kovsky-Apap ([Deborah.Kovsky@troutman.com](mailto:Deborah.Kovsky@troutman.com)); (d) counsel to the Equity Committee, (i) Brown Rudnick LLP, 7 Times Square New York, NY 10036, Attn: Robert J. Stark ([RStark@brownrudnick.com](mailto:RStark@brownrudnick.com)) and Bennett S. Silverberg ([BSilverberg@brownrudnick.com](mailto:BSilverberg@brownrudnick.com)); (ii) Morris James LLP, 500 Delaware Avenue, Suite 1500 Wilmington, DE 19801, Attn: Eric J. Monzo ([emonzo@morrisjames.com](mailto:emonzo@morrisjames.com)) and Brya M. Keilson ([bkeilson@morrisjames.com](mailto:bkeilson@morrisjames.com)). Please note that the Objection Deadline may be extended with respect to a particular proposed sale of Assets with the written consent of the Debtors (email being sufficient).

**PLEASE TAKE FURTHER NOTICE** that each Objection must (a) be in writing, in English, and in text-searchable format, (b) state, with specificity, the legal and factual bases thereof, and (c) comply with the Bankruptcy Code, Bankruptcy Rules, Local Rules, and Complex Procedures.

**PLEASE TAKE FURTHER NOTICE** that, absent the proper and timely filing and service of an Objection, the Assets listed on **Schedule 1** attached hereto may be sold free and clear of all liens, claims, encumbrances, or interests pursuant to, among other provisions, section 363 of the Bankruptcy Code, in accordance with the Order.

**PLEASE TAKE FURTHER NOTICE** that, if a timely and properly served (and, if applicable, filed) Objection remains outstanding and unresolved after good-faith negotiations amongst the Debtors and the objecting party, the Debtors (a) shall not proceed with the contemplated sale at issue except upon order of the Court or withdrawal or resolution of such Objection and (b) may request that the Court schedule a hearing on such Objection.

*[Remainder of page intentionally left blank]*

Dated: December 13, 2023

Respectfully submitted,

/s/ Morgan L. Patterson

**WOMBLE BOND DICKINSON (US)  
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